

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS

_____)	
RICHARD E. KAPLAN,)	
)	
<i>Plaintiff,</i>)	
)	
v.)	Civil Action No. 04-10402-NMG
)	
)	
FIRST HARTFORD CORPORATION,)	
)	
<i>Defendant.</i>)	
_____)	

**FIRST HARTFORD CORPORATION'S MOTION
FOR LEAVE TO FILE A REPLY MEMORANDUM
IN FURTHER SUPPORT OF ITS MOTION TO CONSOLIDATE**

Defendant First Hartford Corporation ("FHC") respectfully moves this Court for leave to file a short reply memorandum in further support of its Motion to Consolidate. A copy of the proposed reply is attached to this motion as Exhibit "1."

FHC seeks leave to file this short reply brief to respond to a request for relief sought by plaintiff Richard E. Kaplan ("Kaplan") for the first time in his *Position Regarding Defendant First Hartford Corporation's Motion to Consolidate*. FHC believes the granting of this motion for leave to file a reply will materially assist the Court in rendering its decision on FHC's Motion to Consolidate.

WHEREFORE, FHC requests that the Court grant its Motion for Leave to File a Reply Memorandum in Further Support of its Motion to Consolidate.

Respectfully submitted,

FIRST HARTFORD CORPORATION

By its attorneys,

/s/ Jillian B. Hirsch
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-and-

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Dated: June 22, 2005

LOC. R. 7.1(A)(2) CERTIFICATION

I, Jonathan I. Handler, hereby certify that on June 21 and 22, 2005, I conferred by e-mail with Larry C. Kenna, counsel for plaintiff Richard E. Kaplan, in a good faith attempt to resolve or narrow the issues raised by this motion. During that exchange, Mr. Kenna indicated that his client would not assent to the motion.

/s/ Jonathan I. Handler
Jonathan I. Handler

CERTIFICATE OF SERVICE

I, Jillian B. Hirsch, hereby certify that on this 22nd day of June, I served a true and correct copy of the foregoing *First Hartford Corporation's Motion for Leave to File a Reply Memorandum In Further Support of its Motion to Consolidate* via first class mail on Larry C. Kenna, Choate, Hall & Stewart, Exchange Place, 53 State Street, Boston, Massachusetts, 02109.

 /s/ Jillian B. Hirsch
Jillian B. Hirsch